



Everglades Coalition

1000 Friends of Florida
Angler Action Foundation
Audubon Florida
Audubon of Southwest Florida
Audubon of the Western Everglades
Audubon Society of the Everglades
Backcountry Fly Fishers of Naples
Calusa Waterkeeper
Cape Coral Friends of Wildlife
Center for Biological Diversity
Conservancy of Southwest Florida
Defenders of Wildlife
"Ding" Darling Wildlife Society
Earthjustice
Environment Florida
Everglades Foundation
Everglades Law Center
Everglades Trust
Florida Bay Forever
Florida Conservation Voters Education Fund
Florida Defenders of the Environment
Florida Keys Environmental Fund
Florida Native Plant Society
Florida Oceanographic Society
Friends of the Arthur R. Marshall
Loxahatchee National Wildlife Refuge
Friends of the Everglades
Hendry-Glades Audubon Society
International Dark-Sky Association,
FL Chapter
Izaak Walton League of America
Izaak Walton League Florida Division
Izaak Walton League Florida Keys Chapter
Izaak Walton League Mangrove Chapter
Lake Worth Waterkeeper
Last Stand
League of Women Voters of Florida
Martin County Conservation Alliance
Miami Pine Rocklands Coalition
Miami Waterkeeper
National Audubon Society
National Parks Conservation Association
National Wildlife Refuge Association
Natural Resources Defense Council
North Carolina Outward Bound School
Ocean Research & Conservation Association
Peace River Audubon Society
Reef Relief
Sanibel-Captiva Conservation Foundation
Sierra Club
Sierra Club Florida Chapter
Sierra Club Broward Group
Sierra Club Calusa Group
Sierra Club Central Florida Group
Sierra Club Loxahatchee Group
Sierra Club Miami Group
South Florida Audubon Society
Southern Alliance for Clean Energy
The Florida Wildlife Federation
The Institute for Regional Conservation
The National Wildlife Federation
Theodore Roosevelt Conservation
Partnership
Tropical Audubon Society

May 18, 2020

Toni Edwards
South Florida Water Management District
P.O. Box 24680
West Palm Beach, FL 33406

Sent Via Email: tedwards@sfwmd.gov

Re: Water Reservation Rules for the Kissimmee River and Chain of Lakes

Dear Ms. Edwards:

The 61 member organizations of the Everglades Coalition, representing local, state, and national conservation and environmental organizations dedicated to restoring America's Everglades, write in support of the adoption of water reservation rules for the Kissimmee River and Chain of Lakes currently being considered by the South Florida Water Management District (District). The water reservation is critical to the success of the Kissimmee River Restoration Project (KRRP) which was undertaken through a 50-50 partnership between the District and the United States Army Corps of Engineers (Corps).

The Kissimmee River once meandered for 103 miles through central Florida before emptying into Lake Okeechobee. Seasonal rains would inundate the two-mile-wide river floodplain creating a rich and diverse wetland ecosystem that provided critical habitat for wading birds, fish and wildlife. However, between 1962 and 1971, the Corps dredged and straightened the Kissimmee River into the canal we now know as the C-38 canal in what was quickly recognized as a misguided effort to drain central Florida. The channelization project drained most of the river floodplain and cut off flow to the historic river channel resulting in devastating impacts to the floodplain ecosystem and the native fish and wildlife it supported. The loss of surface water storage in the adjacent floodplain and the lowering of the Kissimmee Chain of Lakes decreased regional water storage capacity and accelerated the conveyance of water to Lake Okeechobee spawning a host of adverse consequences including high-water harm to the Lake and Northern Estuaries, nutrient pollution, harmful algal blooms, and following massive and wasteful water releases, increased water shortage problems.

Committed to full protection and restoration of America's Everglades

In recognition of the significant environmental harm caused by channelizing the Kissimmee River, the Corps and the District commenced a phased restoration of the river's historic meandering path in 1999. The final phases of the project are scheduled to be completed in 2020 and restore over 40 square miles of the river's floodplain ecosystem, including over 25,000 acres of wetlands which will once again provide critical habitat for birds, fish and wildlife. The Headwaters Revitalization Project will allow the maximum water levels of Lakes Kissimmee, Cypress and Hatchinehaw to raise an additional 18 inches each year, reflooding about 20,000 acres of drained lake marshes. In all, the project will increase water storage capacity north of Lake Okeechobee by about 100,000 acre feet.

In order to protect the public's significant investment in and ensure the success of the KRRP, a sufficient quantity of water must be set aside to restore an appropriate hydrological regime for the protection of fish and wildlife. The District has the authority to do so under state law and when so reserved water for this purpose will protect the project from water shortages due to consumptive uses.¹ When finalized, the water reservation rules will be incorporated into the District's consumptive water use permitting program.

The District has attempted on two other occasions to adopt a water reservation for the KRRP, but each effort fell short. The first attempt at rulemaking was initiated in 2008. The District developed a draft technical document which was approved by a peer review panel, but the rulemaking process was suspended. Rulemaking was reinitiated in 2014, but after development of a new technical document and public workshops, rulemaking again was suspended in 2016.

The current rulemaking initiative began in 2018 and is anticipated to conclude in 2020. An updated technical document has been developed, using new hydrologic models to calculate water needs, and the District has held workshops and provided opportunities for public participation. The contributing waterbodies for the proposed water reservation include the Upper Chain of Lakes², the Headwaters Revitalization Lakes³ and the Kissimmee River⁴. The modeling in the technical document has been approved by a peer review panel. New and revised rules have been prepared which will become part of the District's permitting program.

At cost of over \$800 million dollars, the Kissimmee River Restoration Project is an important component of South Florida's environmental future, but in order to reap the full return on this investment, the District must act to approve and adopt the water reservation. We urge the District to finalize the rulemaking process and adopt the water reservation to ensure the success of this decades long project.

Sincerely,



Mark Perry, Co-Chair



Marisa Carrozzo, Co-Chair

¹ 373.223(4) F.S.

² Lakes Hart-Mary Jane, Lakes Myrtle-Preston-Joel, Alligator Chain of Lakes, Lake Gentry, Lake Tohopekaliga, East Lake Tohopekaliga, and associated canals.

³ Lakes Kissimmee, Cypress, Hatchineha, and Tiger, and associated canals.

⁴ To S-65E structure north of Lake Okeechobee; includes Istokpoga Canal and floodplain, C-38 Canal, and remnant river channels from S-65 to S-65E.

Committed to full protection and restoration of America's Everglades